

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

Central District

No. 4:18-cv-40009

D.M., et al.,)	
PLAINTIFFS,)	MOTION TO ENLARGE
)	THE TIME FOR DELAWARE
v.)	COUNTY, OHIO
)	DEFENDANTS TO RESPOND
CYNTHIA DUNGEY,)	
DAVID DOMBROWSKI,)	
ASHLEY KELLER, and,)	
LYNN STACY,)	
DEFENDANTS.)	

Although Delaware County Defendants, David Dombrosky, Ashley Keller, and Lynn Stacey (hereinafter “Delaware County”) contend that the Court is without personal jurisdiction or venue and that proper service of process has not been achieved, Delaware County moves the court to grant a 10-day enlargement of time to respond to Plaintiffs’ Complaint. This will allow the Court to issue ECM/ECF access to the undersigned counsel.

Respectfully submitted,

Carol Hamilton O’Brien
Delaware County Prosecuting Attorney

/s Andrew J. King
Andrew J. King (Ohio Bar #0080206)
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I hereby certify that the above document was served upon the counsel for Defendant Cynthia Dungey and upon the Plaintiffs by first-class, pre-paid, United States mail this Thirteenth day of February, 2018, by forwarding copies to:

Heather and Adam May
187 Ramshorn Rd.
Dudley, MA 01571
and

Assistant Attorney General
Therese Hanna
Ohio Attorney General's Office
Health and Human Services Section
30 East Broad Street 26th Floor
Columbus, Ohio 43215.

Respectfully submitted,

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